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10 Attorneys for Plaintiff
11 De Sol Corp., Inc.

12 UNITED STATES DISTRICT COURT
13
14 NORTHERN DISTRICT OF CALIFORNIA
15
16 (Oakland Division)

17 De Sol Corp., Inc., a California corporation,

18 Plaintiff,

19 vs.

20 Vegas Connection, Inc., a California
21 corporation; Omar Awad, an individual;
22 Jahangir Shahriari, an individual,

23 Defendants.

Case No. C07 4107 SBA

**DECLARATION OF BRANDON L.
REEVES IN SUPPORT OF OPPOSITION
TO DEFENDANTS' MOTION TO
TRANSFER CASE FOR IMPROPER
VENUE**

**Hearing Date: December 18, 2007
Time: 1:00 p.m.
Dept.: 3**

24 I, BRANDON L. REEVES, declare:

25 1. I am an attorney at law duly licensed to practice before this Court. I am an
26 associate at the firm of Greene, Chauvel, Descaso & Minoletti, attorneys of record for Plaintiff
27 De Sol Corp., Inc. in the above-entitled action.

28 2. I submit this declaration in Support of Plaintiff's Opposition to Defendants'
Motion to Transfer Case for Improper Venue, or in the Alternative to Transfer for Convenience.
As reflected by the facts and/or exhibits discussed herein, this declaration is based upon my own

1 personal knowledge, except where stated as based upon information and belief. If called as a
2 witness to testify to the matters asserted herein, I could testify competently.

3 3. Attached hereto as Plaintiff's Exhibit 1 is a true and correct copy of a letter I sent
4 to Defendants' attorney John Richards dated September 5, 2007.

5 4. Mr. Richards agreed to accept service on behalf of Defendants Vegas Connection,
6 Inc. and Jahangir Shahriari. Plaintiff served Defendant Omar Awad by substituted service on
7 August 28, 2007.

8 5. On September 26, 2007, I spoke with Mr. Richards by telephone and Mr.
9 Richards and I agreed that Defendants would have until no later than Friday, October 12, 2007,
10 to file a responsive pleading to Plaintiff's Complaint for Damages.

11 6. Attached hereto as Plaintiff's Exhibit 2 is a true and correct copy of a letter I sent
12 to Defendants' attorney John Richards dated September 27, 2007, which confirms our agreement
13 that Defendants would have until October 12 to file a responsive pleading.

14 7. On Friday, November 16, 2007, Plaintiff De Sol Corp.'s employee Elizabeth
15 Alvaro telephone me and informed me that Jose Antonio Gonzales and Andres Perez (who are
16 currently employed by De Sol Corp.) were recently approached by customers of Defendant
17 Vegas Connection and informed that they had been encouraged to provide false and potentially
18 damaging testimony against Mr. Gonzales, Mr. Perez, and De Sol Corp.

19 8. Attached hereto as Plaintiff's Exhibit 3 is a true and correct copy of a letter I sent
20 to Defendants' attorney John Richards and attorney Bart Botta dated November 19, 2007.

21 9. I believe this Motion to Transfer for Improper Venue is nothing more than a tactic
22 by Defendants to stall the progress of this action as long as possible. This is a rather simple
23 collections action. Plaintiff De Sol Corp. delivered produce to the Defendants but was not paid
24 for it. It is undisputed that the produce was actually delivered. Defendant Jahangir Shahriari
25 *admits in his Declaration that he owes at least half of the amount claimed by Plaintiff* in the
26 Complaint for Damages. See Declaration of Shahriari ¶ 13.

